

ORIGINAL

DOCKET FILE COPY ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Preparation for International)
Telecommunication Union World) IC Docket No. 94-31
Radiocommunication Conferences)

RECEIVED

JUL 15 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COMMENTS OF COMSAT WORLD SYSTEMS

COMSAT Corporation
COMSAT World Systems
6560 Rock Spring Drive
Bethesda, Maryland 20817

Robert A. Mansbach
Its Attorney
301-214-3459

No. of Copies rec'd 0-5
List A B C D E

Summary

CWS believes that the Mobile-Satellite Service (MSS) issues are the most pressing concerns which need to be resolved at WRC-95. In this regard, it is particularly important that feeder link bands be identified which will have the least impact on existing and future Fixed-Satellite Service (FSS) operations.

Other issues on the WRC-95 agenda of importance to CWS include the use of the band 13.75-14 GHz for FSS and the Report of the Voluntary Group of Experts (VGE) on revisions to the Radio Regulations. While use of the new FSS band at 13.75-14 GHz is of great importance to CWS, this will not be a major issue for WRC-95. Rather, it is on the agenda to enable sharing studies, conducted since WARC-92, to be reviewed and confirmed. We fully support the conclusions of these studies and expect that the results will be adopted at WRC-95. Our comments on the VGE Report are preliminary, since considerable review remains necessary which, we believe, will take place in the Informal Working Group on Regulatory Matters (IWG-1) under the Commission's Industry Advisory Committee (IAC).

Additionally, as requested, CWS is providing recommendations on how the Commission could be more responsive to the needs of industry in preparing for future WRCs. Finally, we have suggested that the Commission give consideration to placing the issue of operating shipboard earth stations in certain bands allocated to the FSS on the WRC-97 agenda. This should prompt the necessary preparatory work in the U.S. and, at the international level, to address this emerging service application.

TABLE OF CONTENTS

	PAGE
Summary	(i)
Table of Contents	(ii)
Introduction	1
Feeder Links	2
Radio Regulation 2613	4
FSS in the Band 13.75-14 GHz	5
Report of the VGE	6
The Simplified Radio Regulations	9
Consideration of Resolution 46	11
IFRB Rules of Procedure	15
Preparation for Future WRCs	16
Preliminary Agenda for WRC-97	18
Preliminary Agenda for WRC-99	20
Conclusion	21

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

JUL 18 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Preparation for International)
Telecommunication Union World) IC Docket No. 94-31
Radiocommunication Conferences)

COMMENTS OF COMSAT WORLD SYSTEMS

COMSAT World Systems (CWS), a business unit of COMSAT Corporation, herein submits its Comments on the Federal Communications Commission's Notice of Inquiry (Notice) in the above-captioned proceeding related to preparations for the 1995 ITU World Radiocommunication Conference (WRC-95).

Introduction

WRC-95 is scheduled to convene in November 1995 in Geneva to consider the substantive agenda that was developed at WRC-93 and adopted by the ITU Council at its May 1994 session. In its Comments, CWS will address a number of issues raised in the Notice related to WRC-95 and will also provide its views on the preliminary agendas for the WRC-97 and WRC-99 Conferences.

As discussed in greater detail below, we believe the Mobile-Satellite Service (MSS) issues are the most pressing and essential concerns which need to be resolved at WRC-95. One of the most important MSS issues relates to allocations for MSS

feeder links using Fixed-Satellite Service (FSS) bands. Both CWS and COMSAT Mobile Communications have a major interest in assuring that feeder link bands are identified which will have the least impact on existing and future FSS operations, and, at the same time, be desirable MSS feeder link bands which could win adoption at WRC-95.¹

Other issues of interest to CWS on the WRC-95 agenda concern the use of the band 13.75-14 GHz allocated at WARC-92 on a primary basis to the Fixed-Satellite Service (FSS); the Report of the Voluntary Group of Experts (VGE) on revisions to the Radio Regulations; and possible ways the Commission could be more responsive to industry needs in preparing for future WRCs. Finally, with regard to the preliminary agendas for WRC-97 and WRC-99, we suggest that the Commission consider placing the issue of operating shipboard earth stations in certain bands allocated to the FSS on the WRC-97 agenda.

Feeder Links

Identifying candidate bands for MSS feeder links and applying acceptable criteria, which eliminate from consideration certain FSS bands, while narrowing the focus to more appropriate

¹ CWS will briefly discuss the feeder link issues herein. For an in-depth analysis of the feeder link issues see Comments of COMSAT Mobile Communications, filed July 15, 1994, in this proceeding.

and desirable FSS bands, could be a sound approach for the Commission's IAC IWG on Feeder Links.² Already, in the international forum, the ITU Radiocommunication Sector has established Task Group (TG) 4/5 to study the spectrum requirements for MSS feeder links. TG 4/5 will also determine the feasibility of using certain FSS bands for MSS feeder links which would operate either in the normal direction for transmit and receive bands or in the reverse band working (RBW) mode. The approach taken by TG 4/5 thus far places considerable emphasis on protecting sensitive FSS networks and makes it improbable that MSS feeder links could be successfully operated in the heavily congested FSS bands below 16 GHz. This is a practical and reasonable approach, which, we believe, will lead to identifying FSS bands that can support MSS feeder links without undue limitations on FSS future operations.³

In this regard, sharing may be feasible in other lightly used FSS bands either in the normal direction or in the RBW mode

² We note with much satisfaction that Mr. Jack Wengryniuk has been appointed Chairman of the Informal Working Group on Feeder Links under the Commission's Industry Advisory Committee. We know that he will be an effective and objective Chairman and CWS will work to the best of its ability to serve the interests of this group in support of the Commission's efforts.

³ At a time when the U.S. is actively leading the world toward the Global Information Infrastructure (GII), the FSS provides ready telecommunications access to almost all countries of the world and provides the principal telecommunications access to many developing countries. Building upon this existing base of services, the FSS represents a fundamental building block in extending the GII beyond the industrialized countries. Thus, future FSS growth cannot be discounted.

and, therefore, MSS feeder links may well be feasible in these bands. The process underway at the international level and within the Commission's Industry Advisory Committee (IAC) to find suitable MSS feeder links appears to be on a sound course and we are confident that the results of these efforts will provide reasonable options for the Commission. Early identification of prime bands are essential to gaining broad international support for particular bands at WRC-95. Absent prior coordination and consultations, consensus may prove to be difficult. Accordingly, we believe the objective should be to allocate a certain number of feeder link bands at WRC-95, and then, based upon further analysis, the issue of additional bands should be addressed at WRC-97.

Radio Regulation No. 2613

The Commission has invited comments regarding actions required to find additional spectrum for feeder links and/or to clarify RR No. 2613 in a manner that would be equitable to non-GSO operators.⁴ We support the current work of ITU-R Task Group 4/5, which has been providing specific solutions for cooperative use of the radio frequency spectrum by both the new non-GSO MSS systems and the existing and growing FSS systems. In this work, three categories of priority have been established. The three category approach holds promise for equitable use of the limited

⁴ See, Notice at para. 24.

radio frequency spectrum by providing regulatory parity in bands to be shared on an equal basis between GSO and non-GSO systems and by allowing regulatory provisions to be made to accommodate future expansion of both the MSS and the FSS in separate protected allocations. A new approach is needed since it has become clear that the present application by the Radio Regulations Board of RR 2613 does not serve its originally intended purpose and is not suited to address new developments.

The process of addressing procedural aspects of the implementation and protection of non-GSO MSS systems at WRC-95 will give the opportunity to revise or replace RR 2613 in a clear and unambiguous form which both the FSS and MSS community can accept as fair and equitable. While RR 2613 may presently be inequitable to non-GSO systems, its repair (or more likely its replacement) must meet the needs of both FSS and MSS users. We expect that this issue will be dealt with in the WRC-95 IAC and that the Commission will have the benefit of this work in reaching its decisions on U.S. proposals to the WRC-95.⁵

FSS in the Band 13.75-14 GHz

In its Notice, the FCC requests comments on the allocation

⁵ For a more detailed examination of the work underway on MSS feeder links and related issues, including candidate bands under consideration, see the Comments filed today by COMSAT Mobile Communications in this proceeding.

of the band 13.75 to 14 GHz to the FSS by WARC-92.⁶ CWS fully supports the results of the studies conducted by Task Groups 4/4 and 7/3 in confirming the sharing criteria between the radio location service and the FSS (RR 855A) and setting forth the criteria necessary to protect the space research service under RR 855B. The opening of the 13.75-14 GHz band to the FSS is an example of cooperative innovative sharing of the spectrum, which will become more prevalent as demand for spectrum below 30 GHz grows. It is important that the results of the studies performed by ITU-R Task Groups 4/5 and 7/3 be accepted by WRC-95 and Resolution 112 be addressed to finalize the FSS allocation in the 13.75 to 14 GHz band made at WARC-92.

Report of the VGE

The WRC-95 Conference has, as the first item on its agenda, a review of the final report of the VGE and consideration of related proposals from administrations concerned with simplifying the Table of Frequency Allocations and the other provisions of the Radio Regulations. The VGE has worked since 1990 to produce the comprehensive Report that was submitted to the May 1994 session of the ITU Council, which will be considered at WRC-95. The task given to the VGE to simplify the Radio Regulations was a daunting one, considering that the Radio Regulations have evolved over many decades of radio conferences through difficult

⁶ See, Notice at para 29.

negotiations. Indeed, the choice of individual words and phrases was often the center of much debate because of the import of the Regulations and their treaty status. Given the scope and difficulty of the work, the VGE has performed exceedingly well and the Report is a valuable product which may well be the basis for improved and simplified regulations. Nevertheless, we have several general concerns which the Commission should take into account in preparing for WRC-95. We also have some specific comments on particular aspects of the VGE Report, which are discussed below.

In making these comments, CWS notes that the Commission has provided an opportunity for the industry, which for the most part has not been deeply involved in the work of the VGE, and other interested parties to collectively review and address the VGE Report within the IAC. Specifically, the Regulatory Coordination Group (IWG-1), under the able chairmanship of Mr. Raul Rodriguez, has the mandate to review the Report and make recommendations to the Commission. CWS is actively participating in this group and will no doubt benefit greatly from the collective review that is now underway. Moreover, having the benefit of government experts involved in the IWG-1, who have in-depth knowledge and experience in implementing the provisions of the Radio Regulations, will be of considerable value to the industry. We also take note of the effort that is underway by the government in the IRAC to review the VGE Report and expect that this review will identify issues

that are also of concern to the private sector. We hope that the results of this review can be shared with the IAC in the mutual interest of developing sound U.S. proposals.⁷

One general concern to CWS is the sheer magnitude of the task of examining the VGE Report and making decisions on the proposed revisions to the Radio Regulations at WRC-95. Our concern is that the VGE agenda item could consume the resources and time available to the Conference and unduly distract from the MSS issues which should have priority and must be resolved at WRC-95. The four weeks allocated to the work of the Conference may seem like a long time. But, given the scope and importance of the agenda items, the Conference may be at risk of being overwhelmed. Accordingly, the Commission should consider ways that the Conference could structure itself to avoid the possibility that the VGE issues could become too time consuming.

For example, in addition to considering the VGE issues in a separate committee at the Conference, a time limit could be placed on the debate at the plenary sessions. In cases where particular VGE issues cannot be resolved without prolonged debate, it may be appropriate to have an understanding that these issues could be postponed and considered at WRC-97, after more

⁷ CWS is actively participating in the IAC which, we believe, will play a major role in developing sound positions on a number of important WRC-95 issues.

work and consultation with those Members which have particular problems. Understanding the proposed revisions and their implications is critical to reaching agreements. Four weeks may not be enough for those countries that have not been directly involved in the work of the VGE. The ITU seminars which will be held prior to WRC-95 should be helpful in bringing a level of understanding to those who participate, but this may not be sufficient. CWS believes it is better to plan ahead and make provisions to ensure that the VGE issues do not disrupt consideration of MSS agenda issues. If WRC-95 issues must be carried over to future WRCs, U.S. interests will be better served if decisions on the VGE issues are postponed to avoid delaying decisions on the MSS issues which must be taken at WRC-95.

Another general concern involves procedural matters in the Radio Regulations for notification, coordination and registration of satellite systems and the possibility that the VGE-simplified Radio Regulations may not have captured certain particular situations which may have been lost in the simplification process. CWS intends to focus on this question in the work of IWG-1.⁸

⁸ We note that the Commission has also raised this concern regarding Resolution 46 in the Final Acts of WARC-92 related to the procedure for coordinating non-geostationary satellite networks in certain MSS bands. See, Notice at n.9.

The Simplified Radio Regulations

Of particular interest to CWS, and, we believe, most important to the U.S., are the VGE Task 2 procedural matters. These procedures detail each step of the process for registering frequency assignments with the ITU. Thus, they have an strong impact on timing of implementation and on the operation of satellite communications systems, both for the FSS and MSS.

It is understood that the charter of the VGE was not to significantly affect the substance of the regulations.⁹ Nonetheless, we are concerned that changes in the language of the intricate procedures providing for the publication of advance information and the coordination and notification of frequency assignments (or networks), although re-crafted with the intention of retaining the thrust and substance of the Radio Regulations, will in subtle ways introduce nuances that may hinder the implementation of satellite-based telecommunications services.¹⁰ We recognize that, in drafting, the VGE took a "clean slate" approach¹¹ to give it the opportunity to simplify the rules without necessarily considering the underlying historical reasons supporting specific text. While easing the task of the VGE, this approach makes it incumbent on each administration to carefully

⁹ See, Notice at paras. 12-15.

¹⁰ See, id. at para. 7.

¹¹ See, id. at para 13.

examine the new modified text, as well as the existing text of the Radio Regulations, for what has been changed and for what has been left out.

Thus, the task of examining the simplified Radio Regulations is not so much one of assuring that the broad principles underlying the process of frequency registration are adhered to. Rather, the simplified Radio Regulations must now be examined from the perspective of each radio service to assure that important, perhaps service-specific, features have been retained. The task at hand is not one of assertion of broad principles; rather, it is one of painstaking detail, involving numerous specific situations.

Consideration of Resolution 46

In its Notice, the Commission cautions that the procedure proposed by the VGE differs from that of Resolution No. 46 (WARC-92) in that the VGE procedure does not contain a definitive cut-off of other administrations' rights.¹² Our reading of Resolution 46, and of the simplified Radio Regulations, gives a different view of this procedure.

Specifically, in this regard, it is necessary to examine Section II of the Annex to Resolution 46, dealing with

¹² See, id. at para 14.

coordination of frequency assignments to a station of a satellite network. Paragraph 2.8 indicates that the administration with which coordination is sought is to notify the administration seeking coordination of its agreement or it must send the technical details upon which its disagreement is based.¹³ Exclusionary text in RR 1101, RR 1102 and RR 1103, in which failure to respond is definitively taken to mean that there will be no harmful interference, is not found within Section II of the Annex to Resolution 46. Therefore, the extent of exposure to negative comments provided after the six-month period for comments has elapsed--but provided before an assignment is notified--is left ambiguous by Resolution 46 and would be a matter for the Radiocommunication Bureau and the Radio regulations Board to consider. In this case, the principle of providing equity to a frequency assignment with prior standing would be reasonable.

The Resolution 46 procedure does provide for limiting the rights of potential affected administrations when an assignment is notified under Section V of the Annex to Resolution 46. Here, for example, an RR 1504 examination would be carried out with respect to conformity with Resolution 46 paragraphs 2.1 or 2.2. In this examination, the Bureau would look for agreements from all administrations which indicated disagreement under para. 2.8.

¹³ Resolution 46 does not give guidance in the case where a potential affected administration may fail to respond.

Thus, a lack of a response to the Section II coordination request from a particular administration would not bar the entry of an assignment into the International Master Frequency Register (IMFR). This limitation of the rights of an administration that fails to respond can only take effect when the assignment is notified.

However, the Simplified Radio Regulations remove the ambiguity with a strong provision. After the request for coordination is made pursuant to para. 3.12 bis, the simplified Radio Regulations specifically provide a definitive cut-off¹⁴ of other administrations rights within the text of para. 3.19.¹⁵ In addition, in the Radio Regulations there is no time limit set on the provision for requesting coordination to be included in an RR 1060 coordination procedure.¹⁶ However, this provision appears in the simplified Radio Regulations (para. 3.17) with a limit of four months from the date of publication of the request for coordination.

¹⁴ The cut-off occurs after a period of four months from the date of publication of the weekly circular containing the coordination request, specified in para. 3.17.

¹⁵ When these regulations do not permit the identification of all affected administrations, those administrations not responding within the time limit specified in SRR No. 3.17 are regarded as unaffected.

¹⁶ RR No. 1080.

Consideration of planned assignments when assessing a proposed non-GSO space service

The Commission has suggested that there could be great difficulty in considering the effect of a non-GSO space service on planned assignments of a potential affected administration.¹⁷ In reviewing the Simplified Radio Regulations, we believe that there is sufficient protection from the possibility of a planned satellite system which has not begun the ITU registration process hindering, for example, the registration of a U.S. satellite system.

Specifically, para. 3.2 of the Simplified Radio Regulations provides that potentially affected administrations may communicate comments concerning advance publication information with respect to its existing and planned satellite systems. This allows comments to be submitted on behalf of satellite networks that have not initiated the ITU registration process and, thus, reflects No. 1047.

However, paras. 3.10 and 3.25 of Section II (dealing with coordination) specify that frequency assignments to be taken into account are given in Appendix S5. In the case of space networks, the Appendix S5 criteria for consideration stipulates that the ITU registration process must have progressed beyond the advance

¹⁷ See, Notice at para 14.

publication stage. These provisions are the same as RR 1061 through RR 1065 of the Radio Regulations.¹⁸

The IFRB Rules Of Procedure

In further support for the need for a detailed review of the Simplified Radio Regulations, we concur with the Commission's observation that due to the scope and nature of the current procedures, it is possible that detailed procedures for some situations may have been inadvertently omitted in the name of simplification.¹⁹ In some cases of intended omission, the VGE intended that the Rules of Procedure would be used to resolve any ambiguities. When the Rules of Procedure are used to resolve uncertainties in the Radio Regulations, they take on the importance and the force of the Radio Regulations themselves. Therefore, it is necessary to consider the Rules of Procedure which will be associated with the simplified Radio Regulations, in making a determination of the suitability and adequacy of the Simplified Radio Regulations.

¹⁸ These comments are not intended to suggest that the VGE reformulation of Resolution 46 procedures is adequate or inadequate. Rather, they are intended to emphasize that the simplified Radio Regulations need to be thoroughly analyzed before U.S. positions are taken.

¹⁹ See, Notice at para 14.

FCC Preparations For Future WRCs

The Commission has requested comments concerning preparations for future WRCs and on ways that the Commission can be more responsive to developing needs of industry. This will enable U.S. interests to be identified on a timely basis and properly represented at future WRCs. As discussed below, CWS strongly supports the Commission's initiative to establish a more regularized process for conference preparations. Given the new ITU structure and schedule of convening WRCs on a biennial basis (and the fact that each WRC also recommends a preliminary agenda for each of the following two conferences), it is incumbent on the Commission, industry, and all stakeholders to take a more systematic approach to preparing for radio conferences.²⁰

Considering the impact that the decisions taken at WRCs have on the availability of new services and on the competitiveness of U.S. industry, we believe that the Commission should enhance the preparatory process and we offer some suggestions to that end. Our suggestions center around three main themes: (1) timely and continuous preparation; (2) clear responsibility and direction; and (3) ongoing coordination with NTIA and the State Department to address commercial and government user needs and to develop

²⁰ NTIA has recently established a Radio Conference Subcommittee (RCS) within the IRAC to coordinate the views of the federal agencies on future WRCs. This subcommittee replaces the old process of ad hoc committees to prepare for radio conferences. See, id. at n.51.

similar proposals with other countries to avoid last minute efforts to coordinate U.S. proposals internationally.

In this regard, our suggestions are the following:

- (1) establish a continuous process for radio conference preparations that is centered in the "WRC Preparatory Office" that would be created to direct and coordinate all internal and external Commission preparations;
- (2) place responsibility for conference preparations with the head of the WRC Preparatory Office who should name an Executive Coordinator for each of the next two WRCs (1995 and 1997), and, following WRC-95, the Executive Coordinator for WRC-99 should be named;
- (3) create a permanent (renewable) IAC structure whose leadership positions would change after each WRC; Private sector experts should continue to hold these leadership positions and the private sector should provide administrative support to the extend possible.²¹
- (4) increase and highlight the Commission's current liaison activity with the IRAC, and create a more open and regular coordination process between the Commission and NTIA for WRCs; including more joint work efforts between the IAC and the IRAC at the experts level, and more common development of U.S. proposals;
- (5) foster on-going coordination at the international level to develop common proposals for WRCs. This would be in addition to the current technical preparations that take place within the ITU-R, and could, for example, involve increased effort within CITEL to develop common proposals through a WRC Preparatory Working Group in CITEL. To be successful, the U.S. must be prepared to discuss all issues in an effort to jointly develop proposals before formal U.S. proposals are adopted. Each country would, of course, continue to independently submit its own proposals to the WRCs with the objective that there would be a number of similar proposals as a result of the common work and exchange

²¹ However, the WRC Preparatory Office should have sufficient resources to provide substantial administrative support to the IAC.

of information within CITELE and with other key countries before the conference; and

- (6) explore with the Department of State and NTIA the feasibility of naming the U.S. Head of Delegation well in advance of the WRC so that this person could be closely identified with the U.S. preparations; a 2-year lead time would be ideal.

Preliminary Agenda For the WRC-97 Conference

The Commission requested comments to help establish U.S. positions relative to implementing the preliminary WRC-97 agenda and to set a preliminary agenda for WRC-99.²² Pursuant to the new ITU working methods, WRC-95 will recommend to the Council a final agenda for WRC-97 and a preliminary agenda for WRC-99. These are important undertakings which may take considerable time to complete at WRC-95.

CWS agrees with the Commission's expectation that the WRC-95 Conference may need to reserve a large portion of the WRC-97 Conference to deal with unresolved issues remaining from WRC-95. Therefore, it would be wise to limit the number of additional items proposed for the WRC-97 agenda. Already the preliminary agenda for WRC-97 which was adopted at WRC-93 is quite extensive and includes an item for unresolved issues at WRC-95, which will need to be addressed at WRC-97. In our view, it is reasonable to expect that WRC-95 will be able to allocate some bands for MSS feeder links, but additional allocations may be postponed to WRC-

²² Notice at paras. 38 and 41.

97. Also, new MSS service band allocations will likely be carried over to 1997. With regard to the VGE Report and decisions to modify the Radio Regulations, we expect that some issues will be carried over to WRC-97. Indeed, as we suggested in commenting on the VGE Report, provision should be made at WRC-97 to limit debate on VGE issues to avoid consuming too much time at the Conference, which must act on the more pressing MSS issues.

Nevertheless, there is another issue that we believe is important and ripe for consideration at WRC-97, which is related to item 2.2 on the preliminary agenda for WRC-97.²³ This issue concerns the use of shipboard earth stations operating in FSS bands. Item 2.2 on the WRC-97 preliminary agenda concerns several WARC-92 Recommendations and also Recommendation No. 715 taken at WARC-ORB-88. The Commission has noted that WRC-97 is scheduled to consider Recommendation No. 715 concerning simplification of the process for bringing into use multi-band and/or multi-service satellite networks in the geostationary orbit with different classes of user terminals.²⁴ The Commission further notes that Recommendation No. 715 and Recommendation No. 719 (WARC-92) are related and that No. 719 recommends that a future conference consider a single service definition

²³ See, Final Acts of WRC-93, November 1993, Geneva; Resolution No. COM 4/2.

²⁴ Notice at para 39 and n.46.

encompassing MSS and FSS applications.²⁵

In our view, WRC-97 should address the issue of multi-service satellite networks and specifically consider how best to accommodate shipboard earth stations operating in FSS bands (e.g. the 4 & 6 and 11 & 14 GHz bands). We recognize that Recommendation No. 719 was aimed at the higher bands at 20 & 30 GHz. However, given the fact that experimental operations are now authorized for shipboard earth stations in the 4 and 6 GHz bands, we propose that the Commission include this specific application of shipboard earth stations as part of the overall consideration.²⁶

Preliminary View On The WRC-99 Agenda

The new working method of setting preliminary agendas for WRCs two and four years ahead is a good one and should also relieve pressures to load-up the agenda of the next conference, if WRC-99 is scheduled to treat some of the more pressing issues.

²⁵ At WARC-92, one of the U.S. proposals was to define a new "general satellite service" which would accommodate broader satellite applications including MSS, FSS and BSS. While this proposal was not adopted, Recommendation No. 719 was part of the compromise to re-visit this issue.

²⁶ For more discussion on this subject, see Petition for Rule Making to Amend Part 80 of the Commission's Rules and to Reallocate Spectrum of the Fixed-Satellite Service for use by Digital Shipboard Earth Stations (RM-7912), filed by Crescomm Transmission Services. See also, Comments of COMSAT Corp. on the Crescomm Petition, filed April 10, 1992.

However, this approach of a two year cycle for WRCs is new and, in our view, the agendas for WRC-95 and WRC-97 may be overly loaded. This could mean that some issues will likely be carried forward from WRC-95 to WRC-97 to WRC-99. Therefore, WRC-99 may well need to be a catch-up conference and the opportunity to include totally new issues should be limited.

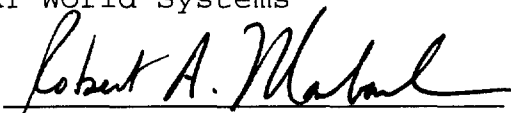
Conclusion

CWS believes that the comments and recommendations filed in this proceeding will be of particular assistance to the Commission in developing U.S. proposals related to the issues on the agenda for WRC-95 and in refining recommended and preliminary agendas for WRC-97 and WRC-99. We look forward to working with the Commission and industry on these issues to further develop U.S. proposals prior to the Conference.

Respectfully submitted,

COMSAT Corporation

COMSAT World Systems

By: 
Robert A. Mansbach
Its Attorney

6560 Rock Spring Drive
Bethesda, Maryland 20817
301-214-3459

July 15, 1994